

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO  
SAVERIN, DUSTIN MOSKOVITZ, ANDREW  
MCCOLLUM, CHRISTOPHER HUGHES, and  
FACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG and  
FACEBOOK, INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,

Additional  
Counterdefendants.

Civil Action No. 1:04-cv-11923 (DPW)

District Judge Douglas P. Woodlock

Magistrate Judge Robert B. Collings

**PLAINTIFF'S MOTION FOR CONTEMPT**

**EXHIBIT A  
[PROPOSED] ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO  
SAVERIN, DUSTIN MOSKOVITZ,  
ANDREW MCCOLLUM, CHRISTOPHER  
HUGHES, and FACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG and FACEBOOK,  
INC.,

Counterclaimants,

v.

CONNECTU LLC,

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CAMERON WINKLEVOSS, TYLER  
WINKLEVOSS, and DIVYA NARENDRA,

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District Judge Douglas P. Woodlock

Magistrate Judge Robert B. Collings

**ORDER**

For the reasons fully set forth in Plaintiff's Motion for Contempt and accompanying memorandum, and upon consideration of the parties' pleadings, Plaintiff's Motion for Contempt is GRANTED and Defendants Facebook, Inc., Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, and Christopher Hughes are hereby ORDERED:

- (1) to produce the following documents within five (5) calendar days of this ORDER:
- (a) Complete annual, quarterly, and monthly financial statements for TheFacebook, Inc., including balance sheets, cash flow statements, income statements;
  - (b) all budgets, plans, and financial projections for Facebook;
  - (c) any valuations of Facebook; and
  - (d) all documents (including but not limited to any stock purchase agreements, due diligence documents, terms sheets, or agreements) related to any actual or potential investment in, loan to, or offers to purchase all or part of Facebook by any person (including but not limited to Accel, Greylock Partners, and Viacom), regardless of whether the transaction was actually completed.
  - (e) all documents relating to Facebook's public statements that its present value is \$2 Billion.

In the event Facebook Defendants fail to produce these documents, Facebook Defendants are precluded from presenting evidence on the value of Facebook, Inc. and from challenging Plaintiff's evidence (including expert testimony) on the value of Facebook, Inc.; and

- (2) to reimburse Plaintiff's attorneys' fees and costs incurred in bringing its Motion for Contempt. Plaintiff is directed to submit a schedule of fees and costs to the Court within fifteen (15) calendar days of this ORDER.

**SO ORDERED.**

Date: \_\_\_\_\_

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District Judge Douglas P. Woodlock  
Magistrate Judge Robert B. Collings